

1 Lawrence A. Bohm (SBN: 208716)

2 lbohm@bohmlaw.com

3 Kelsey K. Ciarimboli (SBN: 302611)

4 kciarimboli@bohmlaw.com

5 Daniel T. Newman (SBN: 314937)

6 dnewman@bohmlaw.com

7 Angelique J. Rael (SBN: 347651)

8 arael@bohmlaw.com

9 **BOHM LAW GROUP, INC.**

10 4600 Northgate Boulevard, Suite 210

11 Sacramento, California 95834

12 Telephone: 866.920.1292

13 Facsimile: 916.927.2046

14 Email: blg000688@bohmlaw.com

15 Gregory R. Davenport (SBN: 154403)

16 gordatlaw@aol.com

17 **LAW OFFICES OF GREGORY R. DAVENPORT**

18 3439 Brookside Road, Suite 205

19 Stockton, California 95219

20 Telephone: 209.955.1999

21 Facsimile: 209.475.4951

22 Attorneys for Plaintiff,

23 CARLOS WILLIAMS

24 UNITED STATES DISTRICT COURT

25 EASTERN DISTRICT OF CALIFORNIA

26 CARLOS WILLIAMS,

27 Plaintiff,

28 v.

29 COUNTY OF SACRAMENTO; RANCHO
30 CORDOVA POLICE DEPARTMENT; and
31 DOES 1 through 50, inclusive,

32 Defendants.

33 THOMAS WILLIAMS,

34 Plaintiff,

35 v.

36 Case No.: 2:19-cv-02345-TLN-KJN

37 Case No.: 2:20-cv-00598-TLN-KJN

38 **JOINT STIPULATION AND ORDER TO
39 CONTINUE PRE-TRIAL DEADLINES**

40 Action Filed: October 4, 2019

41 Trial Date: Not Set

1 COUNTY OF SACRAMENTO; CITY OF
2 RANCHO CORDOVA; NATHAN DANIEL;
3 JOSEPH ZALEC; DEREK HUTCHINS and
4 DOES 1 through 50 inclusive,

5 Defendants.

6 Plaintiffs THOMAS WILLIAMS and CARLOS WILLIAMS (“Plaintiffs”) and
7 Defendants COUNTY OF SACRAMENTO, CITY OF RANCHO CORDOVA, NATHAN
8 DANIEL, JOSEPH ZALEC, AND DEREK HUTCHINS, (collectively “Defendants”), by and
9 through their (“Parties”) counsel of record, hereby stipulate and request that the Court continue
10 the deadlines for expert witness disclosures and supplemental expert witness disclosures for 45
11 days. Good cause exists for the requested continuance pursuant to Federal Rules of Civil
12 Procedure Rule 16(d) based upon the following:

13 1. On July 15, 2021, this Court consolidated the above-referenced cases with respect
14 to discovery only.

15 2. On October 5, 2021, in Case No. 2:20-cv-00598-TLN-KJN, this Court issued an
16 Amended Pre-Trial Scheduling Order setting forth all pre-trial deadlines. The Court entered the
17 same Order on October 26, 2021 in Case No. 2:19-cv-02345-TLN-KJN.

18 3. On April 6, 2022, this Court granted the Parties’ joint stipulation to extend the pre-
19 trial deadlines, which extended the fact discovery deadline to January 12, 2023.

20 4. On January 19, 2023, this Court granted the Parties’ joint stipulation to extend
21 discovery deadlines for the limited purposes of completing the defendant deputies’ depositions,
22 facilitating the production of records pursuant to the Court’s January 6, 2023 Order [Dkt. Nos. 43
23 & 48], and having Plaintiffs’ expert examine the physical camera that was in Deputy Daniel’s
24 vehicle on the night of the incident and subsequently removed. This Court also granted the Parties’
25 request to extend expert disclosure and dispositive motions dates.

26 5. The Parties are working diligently to prepare and gather expert reports, and agree
27 that more time is needed for the experts to finalize their reports.

28 ///

1 6. The Parties, through their respective undersigned counsel, agree and hereby do
 2 stipulate to respectfully request that the Court modify the scheduling order as follows:

Event	Schedule	Proposed New Schedule
Expert Witness Disclosure	June 12, 2023	July 27, 2023
Supplemental Expert Witness Disclosure	Within 20 days after designation of expert witnesses	Within 45 days after designation of expert witnesses: September 10, 2023
Dispositive Motions	November 13, 2023	Remains unchanged

7
 8 Date: June 2, 2023

9 By: /s/ Kelsey K. Ciarimboli, Esq.
 10 LAWRANCE A. BOHM, ESQ.
 11 KELSEY K. CIARIMBOLI, ESQ.
 12 DANIEL T. NEWMAN, ESQ.
 13 ANGELIQUE J. RUEL, ESQ.
 14 GREGORY R. DAVENPORT, ESQ.

15
 16 Attorneys for Plaintiffs,
 17 CARLOS WILLIAMS and
 18 THOMAS WILLIAMS

19
 20 Date: June 2, 2023

21 By: /s/ Jennifer L. Thompson, Esq.
 22 CARL L. FESSENDEN, ESQ.
 23 JOHN R. WHITEFLEET, ESQ.
 24 JENNIFER L. THOMPSON, ESQ.

25
 26 Attorneys for Defendant,
 27 RANCHO CORDOVA POLICE
 28 DEPARTMENT

29 Date: June 2, 2023

30 By: /s/ Van Longyear, Esq.
 31 VAN LONGYEAR, ESQ.

32
 33 Attorneys for Defendant,
 34 COUNTY OF SACRAMENTO

35
 36 BOHM LAW GROUP, INC.
 37 4600 NORTHGATE BOULEVARD, SUITE 210
 38 SACRAMENTO, CALIFORNIA 95834

ORDER

Good cause having been shown, based on the foregoing Stipulation by the Parties, the Court hereby ORDERS as follows:

1. The pre-trial deadlines in this case shall be amended as follows:

Event	Schedule	Proposed New Schedule
Expert Witness Disclosure	June 12, 2023	July 27, 2023
Supplemental Expert Witness Disclosure	Within 20 days after designation of expert witnesses	Within 45 days after designation of expert witnesses: September 10, 2023
Dispositive Motions	November 13, 2023	Remains unchanged

IT IS SO ORDERED.

Dated: June 2, 2023

John - Hanley

Troy L. Nunley
United States District Judge

BOHM LAW GROUP, INC.
4600 NORTHGATE BOULEVARD, SUITE 210
SACRAMENTO, CALIFORNIA 95834